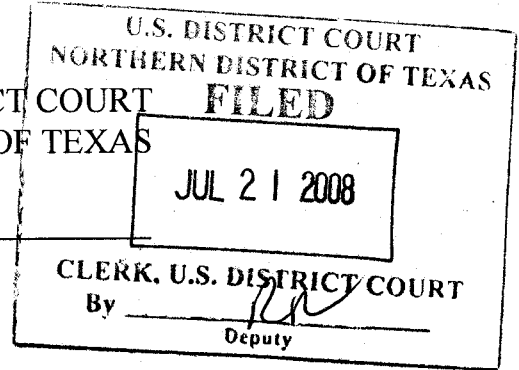


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

LAKENDRA IRENE AVERY (12)
a.k.a. "Kendra"

§
§
§
§
§
§

No. 3:08-CR-152-N

FACTUAL RESUME

ELEMENTS

UNLAWFUL USE OF A COMMUNICATION FACILITY
(21 U.S.C. § 843(b))

First: That the defendant knowingly used a cellular telephone as charged in the superseding information; and

Second: That the defendant used the cellular telephone with the intent to aid or assist in the commission of the offense of possession with intent to distribute a Schedule I controlled substance.

Stipulated Facts


Avery admits and acknowledges that on or about January 25, 2008, she communicated with an individual she believed was a customer interested in purchasing quantities of 3,4-methylenedioxy methamphetamine (ecstasy) but was in fact an undercover Dallas police officer. Avery admits that after being introduced to the undercover officer, she contacted a known ecstasy dealer named Terrence Emmanuel Rone a.k.a. "T-Rone" via cellular telephone with the express intent to aid and assist the


Lakedra Avery's Factual Resume - Page 1
Contents of this page agreed to by Avery: JA (initial)

undercover officer in the purchase of ecstasy.

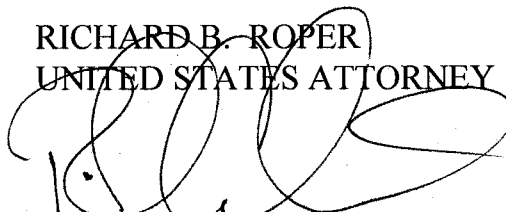
Avery admits that after contacting Rone via cellular telephone, she and the undercover officer traveled to a shopping center parking lot off of Loop 12 in Dallas, Texas. Avery admits and acknowledges that after contacting Rone via cellular telephone a second time, she directed the undercover officer to drive to an apartment complex nearby. Avery further admits that once they arrived at the apartment complex, Rone entered the vehicle with her and the undercover officer and distributed 100 units of ecstasy to the undercover officer for \$550.00 in United States currency.

AGREED TO AND SIGNED this the 15th day of July, 2008.


LAKEDRA IRENE AVERY
Defendant


RODERICK WHITE
Attorney for the Defendant

RICHARD B. ROPER
UNITED STATES ATTORNEY


RICK CALVERT
Assistant United States Attorney
Northern District of Texas
Texas State Bar No. 03669700
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8675